

**REMARKS**

I. Status of the Claims

Claims 22 through 26 are pending in this application. By this Amendment, claims 22-26 have been amended. Claims 22 and 25 are independent claims.

Applicants acknowledge the Examiner's citation of statutory authority as a basis for claim rejections.

II. Rejections under 35 U.S.C. § 103

The Examiner has rejected claims 1-5, 9-10, 12 and 22-28 under 35 U.S.C. § 103 as being unpatentable over Shinomiya in view of Khan. The Examiner has rejected claims 16-17 under 35 U.S.C. § 103 as being unpatentable over Shinomiya in view of Khan and Kao.

By this amendment, claims 1-5, 9-10, 12, 16, 17 and 27-28 are cancelled, and claims 22-26 are amended.

In the office action, the Examiner states that Shinomiya teaches requesting a base station to release allocation. The applicant respectfully submits that Shinomiya discloses that a radio terminal updates base station identification information (col. 5, lines 47-48, col. 6, lines 8-9). Shinomiya also discloses personal stations PS1, PS2 and PS3 update CS-ID stored in EEPROM 27 (col. 19, lines 53-col. 20, lines 26). Moreover, Shinomiya discloses cell stations CS1, CS2 and CS3 update CS-ID stored in an EEPROM 7 (col. 12, lines 11-26, col. 17, lines 34-45).

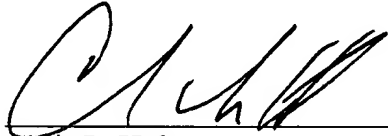
However, Shinomiya does not teach or suggest requesting a base station to release allocation. In claims 22 and 25, the first base station comprises memory means for storing first identification information for specifying a terminal, and the second base station comprises allocation means for allocating second identification information to the terminal for specifying the terminal.

Accordingly, applicant submits that Shinomiya does not teach or suggest requesting the first base station to release the first identification information stored in the memory means.

III. Request for Reconsideration

Applicants respectfully submit that the claims of this application are in condition for allowance. Accordingly, reconsideration of the rejection and allowance is requested. If a conference would assist in placing this application in better condition for allowance, the undersigned would appreciate a telephone call at the number indicated.

Respectfully submitted,  
Milbank, Tweed, Hadley & McCloy LLP

  
Chris L. Holm  
Reg. No.: 39,227

July 7, 2003

Milbank Tweed Hadley & McCloy LLP  
1 Chase Manhattan Plaza  
New York, NY 10005  
(212) 530-5000 / (212) 530-5219 (facsimile)